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1 2 3 4 5 6	Michael P. Balaban State Bar No. 9370 LAW OFFICES OF MICHAEL P. BALABAN 10726 Del Rudini Street Las Vegas, NV 89141 (702)586-2964 Fax: (702)586-3023 E-Mail: mbalaban@balaban-law.com Attorney for Plaintiff	
7	I D HTED CT A TH	
8		ES DISTRICT COURT
9	DISTRICT	Γ OF NEVADA
10		) CASE NO. 2:19-cv-00780-JCM-VCF
11	TONYA HALE,	) STIPULATION AND ORDER CONTINUING
12		) THE DATE THAT PLAINTIFF MUST FILE ) THEIR RESPONSE TO DEFENDANT'S
13	Plaintiff,	) MOTION FOR SUMMARY JUDGMENT
14	VS.	) [LR 6-1; LR 6-2] ) (Fig. 4 Page 1)
15	THE COSMOPOLITAN OF LAS VEGAS;	) (First Request)
16	NV PROPERTY 1, LLC dba THE COSMOPOLITAN OF LAS VEGAS, a	
17	Nevada Limited Liability Company;	
18	RICHARD SHERMAN, an individual,	
19	Defendants.	
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21		)
22	IT IS HEDERY STIDIII ATED AND	AGREED by and between the parties' respective
23	IT IS HEREBY STIPULATED AND AGREED by and between the parties' respective counsels of record pursuant to LR 6-1 and LR 6-2 that Plaintiff's response to Defendant Nevada Property 1, LLC dba The Cosmopolitan of Las Vegas' motion for summary judgment filed on April 12, 2021, for which the opposition is currently due on May 3, 2021, will be continued to	
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27	June 3, 2021. This is the first request to contin	nue the due date for Plaintiff's response.
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to a complex dispositive motion. Delays were previously experienced due to Covid-related shutdowns, health/medical issues of counsel and various witnesses, some of whom were located out of state. The parties have been working as diligently as possible under the circumstances. Discovery has now closed. Plaintiff's counsel, a solo practitioner, needs additional time to respond to the dispositive motion while also balancing obligations in other matters. Defendant does not object to the requested extension. The parties assure the Court this request is not being made for the purpose of delay.  LAW OFFICES OF MICHAEL P. BALABAN  JACKSON LEWIS, P.C.    S/ Lisa A. McClane, Esq.   Lisa A. McClane, Esq.   Lisa A. McClane, Esq.   Lisa A. McClane, Esq.   Michael P. Balaban, Esq.   Joseph Street, Suite 900   Las Vegas, NV 89101   Attorney for Plaintiff   Attorney for Defendant   Dated: April 28, 2021   Dated: April 28, 2021   Dated: April 28, 2021   Dated: April 30, 2021   Dated: April 30	1	Said continuance is being requested in order to provide Plaintiff adequate time to respond		
out of state. The parties have been working as diligently as possible under the circumstances. Discovery has now closed. Plaintiff's counsel, a solo practitioner, needs additional time to respond to the dispositive motion while also balancing obligations in other matters. Defendant does not object to the requested extension. The parties assure the Court this request is not being made for the purpose of delay.  LAW OFFICES OF MICHAEL P.  BALABAN  LAW OFFICES OF MICHAEL P.  BALABAN  JACKSON LEWIS, P.C.  JACKSON LEWIS, P.C.  Lisa A. McClane, Esq.  Lisa A. McClane, Esq.  Lisa A. McClane, Esq.  Jorda Del Rudini Street  Las Vegas, NV 89141  Attorney for Plaintiff  Attorney for Defendant  Dated: April 28, 2021  Dated: April 28, 2021  TI IS SO ORDERED:  LAPII 30, 2021	2	to a complex dispositive motion. Delays were previously experienced due to Covid-related		
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April 30, 2021	11			
Michael P. Balaban, Esq. Michael P. Balaban, Esq. 10726 Del Rudini Street Las Vegas, NV 89141 Attorney for Plaintiff  Dated: April 28, 2021  IT IS SO ORDERED:  UNITED STATES DISTRICT JUDGE  April 30, 2021				
10726 Del Rudini Street Las Vegas, NV 89141 Attorney for Plaintiff  Dated: April 28, 2021  Dated: April 28, 2021  IT IS SO ORDERED:  UNITED STATES DISTRICT JUDGE  April 30, 2021		/s/ Michael P. Balaban, Esq. /s/ Lisa A. McClane, Esq.		
Attorney for Plaintiff  Attorney for Defendant  Dated: April 28, 2021  Dated: April 28, 2021  IT IS SO ORDERED:  UNITED STATES DISTRICT JUDGE  April 30, 2021		10726 Del Rudini Street 300 South Fourth Street, Suite 900		
Dated: April 28, 2021  Dated: April 28, 2021  Dated: April 28, 2021  IT IS SO ORDERED:  UNITED STATES DISTRICT JUDGE  April 30, 2021		Attorney for Plaintiff  Las Vegas, NV 89101  Attorney for Defendant		
18 19 20 21 21 April 30, 2021		Dated: April 28, 2021 Dated: April 28, 2021		
IT IS SO ORDERED:  20 21 21 April 30, 2021				
20 21 UNITED STATES DISTRICT JUDGE  April 30, 2021		IT IS SO ORDERED:		
21 UNITED STATES DISTRICT JUDGE 22 April 30, 2021		Verren C. Mala.		
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